

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION**

NUCLEAR DEVELOPMENT, LLC,	§	
	§	
Plaintiff,	§	CIVIL ACTION CASE NUMBER:
vs.	§	5:18-cv-01983-LCB
TENNESSEE VALLEY AUTHORITY,	§	
	§	
Defendant.	§	

**PLAINTIFF'S PROFFER EXHIBIT LIST**

Plaintiff Nuclear Development, LLC (“ND”) submits the following list of exhibits in support of its Offer of Proof filed contemporaneously herewith:

<b>Ex No.</b>	<b>Description</b>
4	5/5/16 TVA Board Resolution (TVABLN00002633-2634)
9	6/19/18 Email to Matthews from Chardos (TVABLN00002463-2464)
11	9/14/18 NRC summary of meeting (TVABLN00002045-2052)
15	10/25/18 Email from Beeler to Beach (TVABLN00006245-6246)
17	11/9/18 Email from Beach to Blust (TVABLN00002643-2644)
19	11/12/18 Email from ND to TVA (TVABLN00000043-44)
24	11/29/18 Letter from ND to TVA (TVABLN00002651 – 2652)
25	11/30/18 Email with letter from ND to TVA (TVABLN00006461-6464)
26	11/13/18 Email from Blust to Quirk (TVABLN00000038-39)

Ex No.	Description
27	11/14/18 Minutes of Meeting of Board of Directors of TVA
28	11/16/18 Email to Blust, Beach, Chandler, and McCall from Quirk (TVABLN00000040-41)
29	11/28/18 Email from Blust to Quirk and Beach (TVABLN00000042)
30	11/28/18 Email to Beach and Quirk from Blust (TVABLN00000660-661)
31	11/19/18 Email with letter from TVA to ND (ND_004950-4952)
33	8/30/17 Email to Beach from Chandler (TVABLN00005846-5848)
36	11/16/18 Email to Beach, Chandler, Quirk and McCall from Blust (TVABLN0002954)
43	9/9/16 Email from Blust to O'Neill (ND_005048-5056)
45	10/4/16 Email from O'Neill to Frank Haney (ND_005152-5154)
56	3/21/17 Email to Frank Haney and Larry Blust from James Chardos (ND_002996-2999)
57	4/6/17 Email to Frank Haney and Larry Blust from James Chardos (ND_003098)
82	11/13/18 ND Application to NRC (ND_004760-4918)
83	52 FR 38077-01
89	10/18/16 Email from Blust to O'Neill (ND_005159-5162)
90	10/24/2016 Letter from Carrie O'Neil to Larry Blust re: Potential Sale of Bellefonte Nuclear Plant Site (ND_000415 – ND_000417)
100	3/1/18 Email from Chardos to Gillman with Executive Summary Bellefonte Phase 1 Engineering, Licensing, Simulator and Training Proposal (TVABLN00001550)
112	8/28/18 Email from Chardos to Gillman, Davis (TVABLN00002490-2495)
119	11/03/2016 email from Larry Blust to Carrie O'Neil cc Franklin Haney, Frank Haney, Bill McCollum re: Letter of Intent to Bid (ND_005192 – ND_005201)

<b>Ex No.</b>	<b>Description</b>
122	David A. Repka Expert Report dated 2/11/20
123	Construction Permits
127	TVA's DSEP Report (TVABLN00001105-1205)
128	Bellefonte Nuclear Power Plant Completion Project – Independent Engineer Evaluation Report
129	NRC Regulatory Improvements for Production and Utilization Facilities Transitioning to Decommissioning
130	9/14/06 Letter to TVA from Office of Nuclear Reactor Regulation
131	NRC memo regarding reinstatement of CPs
132	Cincinnati Gas & Electric Company, et al.
172	TVA's Responses and Objections to Plaintiff's Amended Third Set of Requests for Admission
174	9/20/18 Email from Gillman to Chardos (TVABLN00001798-1801)
175	10/5/18 Email from Chardos to Frank Haney (ND_004204-4205)
176	10/11/18 Email from Chardos to Frank Haney (TVABLN00002521-2524)
177	11/5/18 Email from Chardos to Frank Haney (ND_004308-4309)
178	11/7/18 Email from Chardos to Blust (TVABLN00000563-599)
179	11/14/18 Email from Chardos to McCollum, Blust (TVABLN00000608-612)
184	Notice of Closing Costs (TVABLN00002510-2511)
190	11/29/18 Email from Chardos to Blust (TVABLN00000615)
192	2/20/17 Letter from Coward to Blust (ND_002756-2763)
206	4/6/06 letter from TVA to NRC
207	6/29/06 letter from TVA to NRC
208	8/22/06 letter from NRC to TVA
300	3/9/09 letter from NRC to TVA re: reinstatement of construction permits
303	7/30/18 Email from George Higginbottom to Erin Henderson (TVABLN00000625-627)

Ex No.	Description
304	TVA/Concentric Offering Memorandum (ND_000144-000217)
305	11/3/20 NRC letter to Nuclear Development
312	11/3/20 letter from NRC to ND
313	[Doc. 128-2] NRC's December 17, 2020, Memorandum and Order, CLI-20-16)
314	[Doc. 129-1] NRC Letter dated 1/22/21
	[Doc. 17] Stipulation of the Parties Regarding Plaintiff's Motion for Preliminary Injunction
	Timeline
	Undisputed Facts
	TVABLN00002602-2610
	TVABLN00003848
	TVABLN00005060-5062

Respectfully submitted on this 19<sup>th</sup> day of May, 2021.




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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I do hereby certify that, on May 19, 2021, I filed the foregoing pleading with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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*Cain O'Rear*